

SDNY (Rev. 10/2006) Pro Hac Vice Motion to Admit Counsel

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMES MERCHANDISING
CORPORATION

Plaintiff,

08-cv-1836 (RMB)

- against -

GROTON INDUSTRIES, INC.,
d/b/a

Defendant.

CHEYENNE INDUSTRIES, INC.

MOTION TO ADMIT COUNSEL

PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Bonnie Bolz Merkt, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

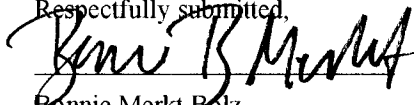
Applicant's Name: Frank Stewart Headlee
Firm Name: Hopkins Law Firm
Address: 1000 West Second Street
City/State/Zip: Little Rock, AR 72201
Phone Number: (501) 375-1517
Fax Number: (501) 375-0231

Frank Stewart Headlee is a member in good standing of the Bar of the States of Arkansas, and United States District Courts for the Eastern and Western Districts of Arkansas.

There are no pending disciplinary proceedings against Frank Stewart Headlee in any State or Federal court.

Dated: February 25, 2008
City, State: New York, New York

Respectfully submitted,



Bonnie Merkt Bolz
BBM-4662
White & Case LLP
1155 Avenue of the Americas
New York, NY 10036
212-819-8200
212-354-8113

FILED
U.S. DISTRICT COURT
2008 FEB 26 PM 1:53
S.D. OF N.Y.

Supreme Court
State of Arkansas
Little Rock

CERTIFICATE OF GOOD STANDING


State of Arkansas

in the Supreme Court

I, Leslie W. Steen, Clerk of the Supreme Court of Arkansas, do hereby certify that Frank Stewart Headlee was enrolled as an Attorney at Law and Solicitor in Chancery by the Supreme Court of this State on September 2, 2003; that no disbarment proceedings have been filed against him in this court, that he has not had any adverse disciplinary action whatsoever during the past three year period, and that his private and professional character appear to be good.

In Testimony Whereof, I hereunto
set my hand as Clerk and affix the seal of Said Court
this 31st day of January, 2008.

LESLIE W. STEEN
(CLERK SUPREME COURT OF ARKANSAS)

By 
Deputy Clerk

UNITED STATES DISTRICT COURT
EASTERN AND WESTERN DISTRICTS OF ARKANSAS

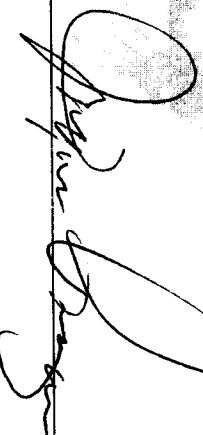
CERTIFICATE OF GOOD STANDING

I, James W. McCormack, Clerk of the United States District Court for the Eastern District of Arkansas, do hereby certify that Frank Stewart Headlee, Bar Number 2003091, was duly admitted to practice in said Court on October 28, 2003, and is in good standing as a member of the bar of said Court.

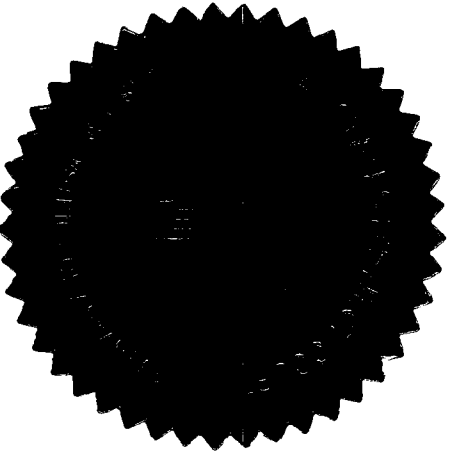
In testimony whereof, I hereunto set my hand and affix the
Seal of said Court, at my office in Little Rock, Arkansas,
this 31st day of January, 2008.

JAMES W. MCCORMACK, CLERK

By: _____



Deputy Clerk



SDNY (Rev. 10/2006) Pro Hac Vice Affidavit

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMES MERCHANDISING
CORPORATION

Plaintiff,

08-cv-1836 (RMB)

- against -

GROTON INDUSTRIES, INC.,
d/b/a
CHEYENNE INDUSTRIES, INC.

Defendant.

**AFFIDAVIT OF
BONNIE BOLZ MERKT
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

State of New York)
)
County of New York) ss:

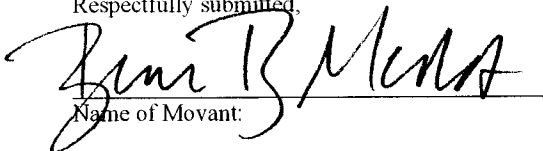
BONNIE BOLZ MERKT, being duly sworn, hereby deposes and says as follows:

1. I am an associate with White & Case LLP, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Frank Stewart Headlee as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on October 27, 2007. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Frank Stewart Headlee since February of 2007.
4. Mr. Headlee is an associate with the Hopkins Law Firm of Little Rock, Arkansas.
5. I have found Mr. Headlee to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the for the admission of Mr. Headlee, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Mr. Headlee, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Mr. Headlee, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: February 25, 2008
City, State: New York, New York
Notarized:

Respectfully submitted,


Name of Movant:

SDNY Bar Code: BBM-4662

SDNY (Rev. 10/2006) Order for Admission Pro Hac Vice on Written Motion

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMES MERCHANDISING
CORPORATION

Plaintiff,

08-cv-1836 (RMB)

- against -

GROTON INDUSTRIES, INC.,
d/b/a
CHEYENNE INDUSTRIES, INC.

Defendant.

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Bonnie Bolz Merkt, attorney for Groton Industries, Inc., d/b/a Cheyenne Industries, Inc.,
and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Gregory M. Hopkins
Firm Name: Hopkins Law Firm
Address: 1000 West Second Street
City/State/Zip: Little Rock, AR 72201
Phone Number: (501) 375-1517
Fax Number: (501) 375-0231
Email Address: ghopkins@hopkinslawfirm.com

is admitted to practice pro hac vice as counsel for Groton Industries, Inc., d/b/a Cheyenne Industries, Inc., in the
above captioned case in the United States District Court for the Southern District of New York. All attorneys
appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline
of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately
apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of
Court.

Dated:

City, State: New York, New York

United States District/Magistrate Judge

FOR OFFICE USE ONLY: FEE PAID \$

SDNY RECEIPT#

SDNY Form Web 10/2006

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMES MERCHANDISING CORPORATION

Plaintiff,

v.

GROTON INDUSTRIES, INC., d/b/a
CHEYENNE INDUSTRIES, INC.,

Defendant.

Case No. 08-cv-1836

AFFIDAVIT OF SERVICE

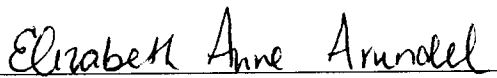
AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
)
COUNTY OF NEW YORK) s.s.:

Elizabeth Anne Arundel, being duly sworn, deposes and states that she resides in Elizabeth, New Jersey; that she is over the age of twenty-one years and that she is not a party to this proceeding.

On the 25th day of February, 2008, deponent caused a copy of the 1) **Motion to Admit Counsel Pro Hac Vice (Frank Stewart Headlee)** and 2) **Affidavit of Bonnie Bolz Merkt in Support of Motion to Admit Counsel Pro Hac Vice** to be served via first class mail on:

Avery Samet, Esq.
STORCH AMINI & MUNVES PC
140 East 45th Street
25th Floor
New York, New York 10017


Elizabeth Anne Arundel

Sworn to before me this
26TH day of February, 2008


Notary Public

BRIAN GILLANDER
Notary Public, State of New York
No. 01G161251
Qualified in Kings County
Commission Expires February 20, 2011